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# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE:	)	IN PROCEEDINGS
CIRCUIT CITY STORES, INC. et al.,	)	UNDER CHAPTER 11
,	)	CASE No. 08-35653

### MOTION TO ADMIT LINDA BRAME TO PRACTICE PRO HAC VICE

NOW COMES W. Joel Charboneau of Magee, Foster, Goldstein & Sayers, P.C. and moves this Court to admit Linda J. Brame of Winters, Brewster, Crosby and Schafer LLC of Marion, Illinois, to appear of record in the above-entitled cause and participate *pro hac vice* on behalf of Creditor William Gower, Name ID: 5000072 and 5000073 and Pack ID: 374710 and 374711 and Creditor Kina Thompson Name ID:5059815, 5059816 and 5059817 and Pack ID:433493, 433494 and 433495, and in support thereof states and certifies to the Court:

- 1. That Movant is an attorney licensed to practice law in the State of Virginia and the Unites States Bankruptcy Court for the Eastern District of Virginia.
- 2. Attorney Linda J. Brame is a licensed attorney in the State of Illinois,
  State of Missouri, the United States District Court for the Southern District of Illinois and
  the United States Bankruptcy Court for the Southern District of Illinois.
- 3. That Movant is a member of good standing in the Virginia Bar and the bar of this Court.
- 4. That Linda J. Brame does not wish to be admitted generally, but for the purpose of this case only.
- 5. That Linda J. Brame is familiar with the law, facts and procedures relating to the subject matter of this litigation.
- 6. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, the Movant requests that this Court waive the requirement that all motions be accompanied by a written memorandum of law.
- 7. No prior request for the relief sough herein has been made to this Court in these bankruptcy cases or to any other court.
- 8. I am a member of this bar and I, or another attorney in my firm that is a member of the bar of this Court, will appear with Ms. Brame at all hearings she attends.

THEREFORE, Movant, W. Joel Charbondeau, respectfully requests this Court enter the proposed order attached as <a href="Exhibit A">Exhibit A</a> granting permission for Linda J. Brame to appear of record and participate *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia.

#### BY: /s/ W. Joel Charboneau

Fax: 540-343-9898

W. Joel Charboneau (#68025) Magee, Foster, Goldstein & Sayers, P.C. Post Office Box 404 Roanoke, Virginia 24003 Phone: 540-343-9800

#### **CERTIFICATE OF SERVICE**

I certify that on February 6, 2009, I served copies of the foregoing by electronic mail on the entities comprising the Primary Service List (as defined in Exhibit A to the Order dated November 12, 2008, governing notice procedures).

By: /s/ W. Joel Charboneau

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#### CERTIFICATE OF MAILING

The undersigned certifies that a copy of the above and foregoing instrument was served by using the ECF system and by depositing same in a U.S. Post Office Box in the City of Roanoke, Virginia, postage fully prepaid and addressed to:

Circuit City Stores, Inc., et al. Claims Processing Dept. Kurtzman Carson Consultants LLC 2335 Alaska Avenue El Segundo, CA 90245

/s/ W. Joel Charaboneau

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## **EXHIBIT A**

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#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE: CIRCUIT CITY STORES, INC. et al.,	) IN PROCEEDINGS ) UNDER CHAPTER 11 ) ) CASE No. 08-35653				
<u>ORDER</u>					
This matter comes before the Cou	art to consider the Motion to Admit Linda Brame				
to Practice Pro Hac Vice. The Court, have	ving considered the Motion, and being otherwise				
sufficiently advised, hereby GRANTS the	e motion in its entirety, and orders that Linda J.				
Brame, is admitted to practice pro hac vice in this matter before the United States					
Bankruptcy Court For The Eastern District of Virginia.					
Dated this day of	, 2009.				
ENTER:					
<del></del>	UNITED STATES BANKRUPTCY JUDGE				
WE ASK FOR THIS:					
/s/ W. Joel Charboneau W. Joel Charboenau, Esq. (VSB #68025) Magee, Foster, Goldstein & Sayers, P.C. P.O. Box 404					

Roanoke, VA 24003-0404 (540) 343-9800

#### **CERTIFICATE OF SERVICE**

I certify that copies of the proposed order were served via electronic delivery and/or first class mail the 6th day of February, 2009, on all necessary parties pursuant to the Order establishing notice procedures in this case.

/s/ W. Joel Charboneau	
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Serve:

All parties that have filed notices of appearance in this case by electronic mail.

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